

# Exhibit 2

JOSEPH SAVERI  
LAW FIRM

601 CALIFORNIA STREET  
SUITE 1000  
SAN FRANCISCO CA 94108

TEL 415.500.6800  
FAX 415.395.9940

March 14, 2022

**Via Electronic Mail**

Steven Kaiser  
CLEARY GOTTlieb STEEN & HAMILTON LLP  
2112 Pennsylvania Avenue, NW  
Ste 1000  
Washington, DC 20037

Re: *Jones v. Varsity Brands LLC*, No. 2:20-cv-02892-SHL-tmp (W.D. Tenn.)

Dear Steven:

I write to address several outstanding issues regarding Plaintiff's First Request for Production of Documents.

**Substantial Completion**

Please confirm that Varsity has substantially completed production of all documents and data responsive to Plaintiffs' First Requests for Production of Documents, as modified by agreement and order of the Court. If Varsity has not, please do so not later than March 18, 2022.

**Text Messages**

On November 17, 2021, you agreed to produce nonprivileged responsive text messages for all Varsity custodians who were current employees. Plaintiffs have not received any text messages. Please do so by March 18, 2022.

**Camps Data**

On November 17, 2021, you agreed to produce structured data regarding Varsity cheer camps. Plaintiffs have not received this data. Please do so by March 18, 2022.

Steven Kaiser  
March 14, 2022  
Page 2

**Privilege Logs**

Please confirm that all responsive material withheld under a claim of privilege and or work product protection has been identified in a privilege log and that the log has been provided to us.

Sincerely,

*/s/ Kevin E. Rayhill*

Kevin E. Rayhill

cc: Matthew Mulqueen  
Joseph R. Saveri  
Ronnie Spiegel